



American Telecommunications Certification Body Inc.  
6731 Whittier Ave, McLean, VA 22101

July 13, 2006

RE: FCC ID: BV8VMXBA\_ATCB003730

Attention: Richard McMurray

I have a few comments on this Application. Please note that further comments may arise in response to answers provided to the questions below.

1. Please explain the relevance of DA-02-2138A1 (UNII peak transmit power) for use with a licensed device. Please note that the most recent interpretation from the FCC states that DA-02-2138A1 is not an appropriate test method for part 90Y devices. The FCC has stated that power for part 90 Y is to be measured "using a spectrum analyzer with settings: RBW>signal BW, VBW > RBW (prefer VBW> at least 3x RBW) no averaging, "trac! e max hold." As you can see this would be a peak measurement. Please note that if the resolution bandwidth cannot be set greater than the signal bandwidth the a correction factor for resolution bandwidth must be applied. Please retest the peak transmit power in accordance with the FCC instructions above.
2. Please note that on page 22 of the test report it appears to be reporting channel power and not Power Spectral Density. Please correct as necessary or please explain how channel power meets the power spectral density requirements of 90.1215(d).
3. Please note that as the power and power spectral density do not appear to have been done correctly, the other issues in the report must be reviewed once these issues have been corrected.
4. Please note that it does not appear that the part 90yMask was done properly. Please see the document attached to the email.
5. FYI - Please note that there are currently several applications for part 90Y that are waiting response from the FCC on proper measurement methods.



Dennis Ward

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The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information may result in application termination. Correspondence should be considered part of the permanent submission and may be viewed from the Internet after a Grant of Equipment Authorization is issued.

Please do not respond to this correspondence using the email reply button. In order for your response to be processed expeditiously, you must submit your documents through the AmericanTCB.com website. Also, please note that partial responses increase processing time and should not be submitted.

Any questions about the content of this correspondence should be directed to the sender.